

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

DENISE B. ALVERSON, et al.,
Individually on behalf of themselves
and on behalf of others similarly
situated;

Plaintiffs,

v.

**COMMUNITY HEALTH
SYSTEMS, INC., et al.**

Defendants.

2:14-cv-01620-KOB

OPPOSED

**PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT
TO ADD ADDITIONAL PARTY PLAINTIFFS**

COME NOW the Plaintiffs, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, and move the Court to grant leave to file a Third Amended Complaint that would only serve to add additional party plaintiffs, In support thereof, Plaintiffs state as follows:

1. Prior to filing this motion, the undersigned counsel conferred with defense counsel, who oppose this motion.

2. The proposed Third Amended Complaint is attached here to as Doc. 54-1.

3. This amendment only adds additional party plaintiffs to this case. Specifically, it adds fourteen additional party plaintiffs who are resident citizens of

Arkansas, Colorado, Idaho, Massachusetts, Mississippi, Missouri, New Jersey, New Mexico, Oregon, Utah, Vermont, Virginia, West Virginia, and the United Kingdom who treated at CHS facilities in Arkansas, Florida, Louisiana, Mississippi, Missouri, New Jersey, New Mexico, Texas, Washington, and West Virginia.

4. No additional causes of action or significant modifications (other than adding party plaintiffs) are contained in this amendment.

5. This matter is set for hearing before the Judicial Panel on Multidistrict Litigation on January 29, 2015. The addition of these plaintiffs, which provides further representation of the states affected by the data breach, may be a significant factor in the Panel's determination whether to consolidate similar cases into an MDL.

6. The defendants will not be prejudiced by this amendment.

WHEREFORE, premises considered, Plaintiffs respectfully request this Honorable Court to grant leave to file the Third Amended Complaint.

Respectfully submitted,

/s/ Donald W. Stewart

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following, on this 27th day of January, 2015:

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